

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE APPLICATION OF :
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MAJED AMIR AL-ATTABI, : .
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For an Order Pursuant to 28 U.S.C. § 1782 to : 21-MC-207 (VSB)
Take Discovery for Use in Foreign Proceedings :
Pending in the Republic of Lebanon. : .
: .
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DECLARATION OF LINDA C. GOLDSTEIN

LINDA C. GOLDSTEIN hereby declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner with Dechert LLP and counsel to Bank Audi S.A.L. I submit this declaration under penalty of perjury.

2. I make this declaration in support of Bank Audi S.A.L.'s motion to quash filed pursuant to 28 U.S.C. § 1782 and Rule 45 of the Federal Rules of Civil Procedure in order to submit copies of the subpoenas served upon four correspondent banks and certain publicly available documents regarding the current financial crisis in Lebanon.

3. Pursuant to the Order issued by this Court on September 3, 2021 (ECF No. 10), Petitioner Majed Amir Al-Attabi served subpoenas upon JPMorgan Chase Bank, N.A. (a copy of which is attached as **Exhibit A**), The Bank of New York Mellon Corporation (a copy of which is attached as **Exhibit B**), Citibank, N.A. (a copy of which is attached as **Exhibit C**), and Standard Chartered Bank (a copy of which is attached as **Exhibit D**). I have been informed that these four subpoenas were served on September 14, 2021.

4. The following documents provide important background regarding the current financial crisis in Lebanon:

- a. A press release issued by the World Bank Group, dated June 1, 2021, is attached as **Exhibit E**.
- b. A *Wall Street Journal* report dated August 6, 2021, and available at https://www.wsj.com/articles/lebanons-economy-still-reeling-from-beirut-port-explosion-falls-off-a-cliff-11628089525?mod=searchresults_pos2&page=1, is attached as **Exhibit F**.
- c. A *National News* report dated October 4, 2021, and available at <https://www.thenationalnews.com/business/2021/10/04/lebanon-resumes-talks-with-imf-for-bailout-package/>, is attached as **Exhibit G**.
- d. A statement published by Banque du Liban, Lebanon's Central Bank ("BdL"), on its Twitter account, dated January 25, 2020, is attached as **Exhibit H**.
- e. BdL Circular No. 153 issued on August 19, 2020, relating to transfers to Lebanese students abroad is attached as **Exhibit I**.
- f. A November 17, 2019 press release issued by the Association of Banks in Lebanon, is attached as **Exhibit J**.
- g. Relevant excerpts from the Lebanese Government's April 30, 2020 Financial Recovery Plan are attached as **Exhibit K**.
- h. Relevant excerpts of Lebanese Parliament Law No. 193 of October 15, 2020, that requires Lebanese banks to make international tuition payments for Lebanese students studying abroad are attached, with an English-language translation, are attached as **Exhibit L**.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
12th day of October, 2021 at New York, New York.

/s/ Linda C. Goldstein

Linda C. Goldstein